

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER**

KRISTOPHER R. MAJORS and wife,)	
CARIE MAJORS,)	
)	
Plaintiffs,)	
)	
v.)	Case No.:
)	
STATE AUTO PROPERTY & CASUALTY)	Judge:
INSURANCE COMPANY,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendant, State Auto Property & Casualty Insurance Company, hereby notifies the Judges of the United States District Court for the Eastern District of Tennessee, the Clerk of the Circuit Court of Franklin County, Tennessee at Winchester, and Plaintiffs, Kristopher R. Majors and wife, Carie Majors, that the action described herein and filed in the Circuit Court of Franklin County, Tennessee at Winchester, is removed to the United States District Court for the Eastern District of Tennessee, at Winchester, pursuant to 28 U.S.C. §1441.

1. On July 17, 2012, plaintiffs, Kristopher R. Majors and wife, Carie Majors, filed a civil action bearing Case No. 2012-CV-18791 against the defendant, State Auto Property & Casualty Insurance Company ("State Auto"), an Ohio corporation, incorrectly named as State Auto Insurance Company, in the Circuit Court of Franklin County, Tennessee. Service of the complaint and summons was made upon the Tennessee Department of Commerce and Insurance on or about July 25, 2012.

2. Plaintiffs filed this action seeking damages for breach of contract and bad faith allegedly due under a contract of insurance written by defendant, State Auto. (See complaint). (A copy attached hereto as exhibit 1).

3. Petitioner seeks removal of this action to this Court on the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000), exclusive of the interest and costs, pursuant to 28 U.S.C. §1332. In particular, the plaintiffs in the underlying action seeks recovery of policy benefits and damages for bad faith for defendant's alleged failure to pay under a homeowner's policy.

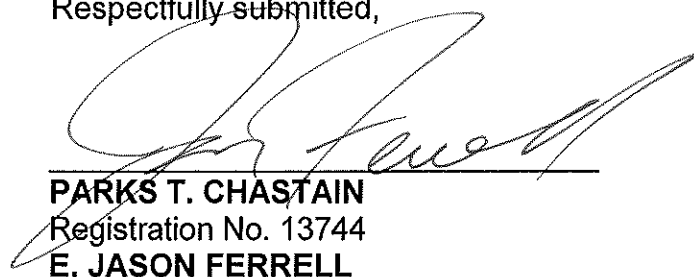
4. Plaintiffs are residents of Winchester, Tennessee in Franklin County, Tennessee, and were at the time of the filing of this action and at the time of the removal. Defendant, State Auto Property & Casualty Insurance Company, is a corporation organized under the laws of the state of Ohio with its principal place of business in Columbus, Ohio. Accordingly, this matter involves citizens of different states.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon defendant, is attached hereto.

WHEREFORE, notice is hereby given that the said Civil Action No. 2012-CV-18791 is removed from the Circuit Court of Franklin County, Tennessee, to this Court.

Respectfully submitted,



PARKS T. CHASTAIN

Registration No. 13744

E. JASON FERRELL

Registration No. 24425

Attorneys for Defendant, State Auto Property &
Casualty Insurance Company

**BREWER, KRAUSE, BROOKS,
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(615) 256-8787

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of August, 2012, a true and correct copy of the foregoing has been sent, via first-class mail, postage prepaid to:

Jerre M. Hood
156 1st Avenue NW
Winchester, TN 37398



E. JASON FERRELL